## IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re:

Chapter 11

BIG LOTS, INC., et al.,

Case No. 24-11967 (JKS)

Debtors.<sup>1</sup>

(Jointly Administered)

Hearing Date: January 21, 2025 at 1:00 p.m. Objection Deadline: January 14, 2025 at 4:00 p.m.

NOTICE OF THE GROVE CITY, OHIO LANDLORD'S MOTION TO COMPEL IMMEDIATE PAYMENT OF POST-PETITION RENT IN ACCORDANCE WITH BANKRUPTCY CODE § 365(d)(3) AND STUB RENT IN ACCORDANCE WITH BANKRUPTCY CODE § 503(b)

PLEASE TAKE NOTICE that on January 7, 2025, Eastgrove Shopping Center LLC (the "Grove City, Ohio Landlord" or the "Landlord") filed the Grove City, Ohio Landlord's Motion to Compel Immediate Payment of Post-Petition Rent In Accordance with Bankruptcy Code § 365(d)(3) and Stub Rent in Accordance with Bankruptcy Code § 503(b).

**PLEASE TAKE FURTHER NOTICE** that any responses or objections to approval of the relief requested in the Motion must be (a) in writing; (b) filed with the Clerk of the Bankruptcy Court, 824 Market Street, 3rd Floor, Wilmington, Delaware 19801, on or before **January 14, 2025**,

<sup>&</sup>lt;sup>1</sup> The debtors and debtors in possession in these chapter 11 cases, along with the last four digits of their respective employer identification numbers, are as follows: Great Basin, LLC (6158); Big Lots, Inc. (9097); Big Lots Management, LLC (7948); Consolidated Property Holdings, LLC (0984); Broyhill LLC (7868); Big Lots Stores – PNS, LLC (5262); Big Lots Stores, LLC (6811); BLBO Tenant, LLC (0552); Big Lots Stores – CSR, LLC (6182); CSC Distribution LLC (8785); Closeout Distribution, LLC (0309); Durant DC, LLC (2033); AVDC, LLC (3400); GAFDC LLC (8673); PAFDC LLC (2377); WAFDC, LLC (6163); INFDC, LLC (2820); Big Lots eCommerce LLC (9612); and Big Lots F&S, LLC (3277). The address of the debtors' corporate headquarters is 4900 E. Dublin-Granville Road, Columbus, OH 43081

at 4:00 p.m. (ET) (the "Objection Deadline"); and (c) served so as to be received on or before the Objection Deadline by the undersigned counsel.

PLEASE TAKE FURTHER NOTICE that, if any objections to the Motion are received, the Motion and such objections shall be considered at a hearing before the Honorable Judge Stickles at the Bankruptcy Court, 824 N. Market Street, 5th Floor, Courtroom No. 6, Wilmington, Delaware 19801 on January 21, 2025 at 1:00 p.m. (ET).

PLEASE TAKE FURTHER NOTICE THAT ONLY OBJECTIONS MADE IN WRITING AND TIMELY FILED AND RECEIVED IN ACCORDANCE WITH THE PROCEDURES ABOVE WILL BE CONSIDERED BY THE COURT AT SUCH HEARING.

IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE MOTION WITHOUT FURTHER NOTICE OR HEARING.

Dated: January 7, 2025

Wilmington, DE 19801

## ESBROOK P.C.

/s/ Scott J. Leonhardt Scott J. Leonhardt (DE 4885) 1000 N. West Street, Suite 1200 Wilmington, DE 19801 (Phone) 302.650.7540 E-Mail: scott.leonhardt@esbrook.com

-and-

Robert B. Berner (0020055)
Bailey Cavalieri LLC
409 E. Monument Ave., Suite 103
Dayton, Ohio 45402
(Phone) 937.223.4701 / (Fax) 937.223.0170
E-Mail: rberner@baileycav.com

Counsel for the Landlord